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August 15, 2025  
*VIA ECF*

The Honorable Anita B. Brody  
United States District Court  
Eastern District of Pennsylvania  
601 Market Street, Room 7613  
Philadelphia, Pennsylvania 19106

**Re: American Society for Testing and Materials v. UpCodes, Inc., Garrett Reynolds, & Scott Reynolds, Case No. 2:24-cv-01895-AB**

Dear Judge Brody:

The parties submit this joint letter motion concerning the discovery schedule in Case No. 2:24-cv-01895-AB. The parties jointly move to reset the pretrial scheduling order in the case for good cause to allow time for the parties to continue conducting discovery in the case.

The parties need additional time to complete document production, serve additional discovery, complete third party discovery, and conduct depositions based on the foregoing discovery. Accordingly, the parties request an extension of the current discovery schedule to complete all fact discovery (including third party discovery).

This is the second time that the parties have requested to reset the scheduling order. Accordingly, the parties jointly move to reset the pretrial scheduling order in accordance with the proposed amended case schedule below for the case for good cause to allow time for the parties to continue to conduct discovery.

Respectfully submitted,

A handwritten signature in black ink that reads 'Jane W. Wise'.

Jane W. Wise



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<b>Event</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Close of Fact Discovery	September 30, 2025	January 30, 2026
Opening Expert Reports from Party Bearing Burden of Proof	October 31, 2025	March 3, 2026
Rebuttal Expert Reports	December 1, 2025	April 1, 2026
Close of Expert Discovery	December 19, 2025	April 20, 2026
Dispositive Motions Filed	February 2, 2026	June 2, 2026
Oppositions to Dispositive Motions	March 2, 2026	July 2, 2026
Dispositive Motion Replies	March 23, 2026	July 23, 2026
Dispositive Motion Sur-Replies	April 13, 2026	August 13, 2026